

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

In the matter of the Complaint of F/V  
MEMORIES, LLC for Exoneration from or  
Limitation of Liability

IN ADMIRALTY

NO. 2:17-cv-01296 RSM

PLAINTIFF'S MOTION AND ORDER RE:  
SECURITY

COMES NOW, Plaintiff F/V Memories, LLC, owner of the vessel F/V MEMORIES,  
Official No. 251934, and moves for entry of an Order directing it to post security under Rule F(1)  
of the Supplemental Rules for Admiralty & Maritime Claims and Local Admiralty Rule 120(b).

Rule F(1) of the Supplemental Rules for Admiralty & Maritime Claims requires the  
plaintiff in a Limitation of Liability action to post security in a sum equivalent to the plaintiff's  
interest in the vessel along with interest at the rate of 6% per annum and costs. Local Admiralty  
Rule 120, subpart (b), states that the amount of security for costs under Rule F(1) shall be \$500.00.

Plaintiff seeks to post the attached Letter of Undertaking, Exhibit A, whereby, in the event  
a final judgment is entered in favor of the claimants, plaintiff's Protection and Indemnity  
Underwriters agree to pay up to \$249,000, a sum equal to plaintiff's interest in the vessel, as per  
the Declaration of Dave Eriksen in Support of FV Memories, LLC's Complaint for Exoneration

1 From or Limitation of Liability [Docket No. 2], plus interest at 6% per annum and costs in any said  
2 final decree, or any lesser amount decreed by the Court or settled between the parties.

3 DATED this \_\_\_\_\_ day of September, 2017.

4 HARRIGAN LEYH FARMER & THOMSEN LLP

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*Counsel for Plaintiff*

17 **ORDER**

18 Based upon Plaintiff's Motion Re: Security, it is hereby ORDERED that, pursuant to Rule  
19 F(1) of the Supplemental Rules for Admiralty & Maritime Claims and Local Admiralty Rule  
20 120(b), Plaintiff shall file with the Court a Letter of Undertaking in the form attached as Exhibit A.

21 DATED this 19 day of September 2017.

22 

23 RICARDO S. MARTINEZ  
24 CHIEF UNITED STATES DISTRICT JUDGE  
25

1 Presented by:

2 HARRIGAN LEYH FARMER & THOMSEN LLP

3 By \_\_\_\_\_

4 Charles Jordan, WSBA #19206

Michelle Buhler, WSBA #16235

5 *of Attorneys for Plaintiff*